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Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 12-268: Expanding the Economic and Innovation
Opportunities of Spectrum Through Incentive Auctions

Dear Ms. Dortch:

On July 1, 2013, I met with Alex Hoehn-Saric the Policy Director to Commissioner Rosenworcel, to discuss the formation of the LPTV Spectrum Rights Coalition, and the over 230 FCC broadcast television licenses we are providing spectrum auction repack guidance to in 25 states. There is an attached PDF of our presentation.

What we learned from the discussion following the presentation was the Commissioner's office is very interested in the new rules being written for the LPTV/TX repacking, and that there needs to be as much outreach as possible to educate the affected parties.

We also discussed the need for better numbers to understand what would be happening with the 6400+ LPTV/TX licensees during the repack. We also discussed how would the current rules apply to the wireless TV broadband builders who have received a significant amount of construction permits, and would be having a hard time building them out before their deadlines. We discussed the waiver one of the wireless TV broadband builders commented on in their NPRM submission and their intent on

filing.

We further discussed the potentially business-ending mandate to have to “double-build” an analog station to a digital station and those licensees who might have to complete the build-out of a CP and within a few years have to rebuild on a lower channel because of the repack.

Further, we discussed the Franken Radio TV channel 6 issue, with the Coalition representing one of the stations which provides a local and diverse local radio channel to over 4 million listeners in MD, VA, and DC. This type of station also operates in NY, LA, Denver, and other major DMA. We discussed a possible way to extend the analog operations beyond the Sept. 2015 end date of analog television, by letting the stations operate analog until the end of the LPTV repack (2017/18+), while having broadcasters and manufacturers conduct tests to see if a combination digital and analog transmitter could work. The main point is that the FCC and auction staff are totally immersed into the NPRM process and any proposed experimental licenses or tests could not be included as an additional item to integrate into the process. However, commenting on this issue via the NPRM rules process, and proposing specific rule language for it in the NPRM, was appropriate.

Respectfully submitted,

Mike Gravino
LPTV Spectrum Rights Coalition
Director